

In the Matter of)
)
Connect America Fund) WC Docket No. 10-90

¹ Public Notice (*Wireline Competition Bureau Announces Deadline for Existing Providers to Notify CenturyLink that They Serve Census Blocks that CenturyLink Proposes to Serve With Connect America Phase I Incremental Support*), WC Docket No. 10-90, DA 16-1072, released September 23, 2016.

Newman, CenturyLink's Senior Vice President Federal Policy and Regulatory Affairs, at melissa.newman@centurylink.com.

As indicated by the attached "Lincoln County, Wyoming" article in the Fall 2016 issue of All West's *Business Connections* publication (Attachment B), All West has participated with Lincoln County to construct a fiber network to serve the rural areas in and around the communities of Kemmerer and Diamondville. The County has constructed the required conduits, and is leasing conduit space to All West on a ten-year basis. All West owns and has installed the fiber optic lines and associated equipment. Construction of the fiber network has now been completed, and All West began serving business and government locations in Kemmerer and Diamondville during October 2016. It will begin providing service to residences in 2017.

All West is furnishing pdf and kmz versions of network maps showing its fiber route marked in red. The kmz version allows the Commission and CenturyLink to verify the locations of the nineteen subject Census Blocks with respect to the fiber network. Attachment A provides estimates of the numbers of homes and businesses in each Census Block. It also lists the numbers of customers – more specifically, business customers – that All West has signed up during its first month of service. All West expects those numbers to grow substantially, and to include households as well as business, during the immediate future.


All West is offering and will provide broadband services at speeds far in excess of the minimum 3 Mbps downstream and 768 kbps upstream speeds applicable to this notification. As noted in the Lincoln County article in Attachment B, the County's Planning & Engineering manager expects the All West fiber network to enable Kemmerer to "be able to market itself as a Gig [Gigabit] community." All West will be able to provide the broadband speeds and service

packages desired by its business and residential customers in the listed nineteen Census Blocks, and expects that most will order service at speeds well above the 3 Mbps downstream and 768 kbps upstream minimums.

Whereas All West has just recently begun service in Kemmerer and Diamondville, it makes no sense for CenturyLink to construct or upgrade facilities within the listed nineteen Census Blocks with federal high cost support dollars when there is a brand new unsubsidized All West fiber network that has just been completed. All West has a fiber network in place that can provide high-speed broadband services to the subject nineteen Census Blocks, is already providing high-speed broadband services to businesses and government offices in those Census Blocks, and will be offering high-speed broadband services to households throughout those Census Blocks within the next few months.

Therefore, All West requests that the nineteen Census Blocks listed in Attachment A be classified as served by an unsubsidized competitor, and that CenturyLink not receive model-based universal service support in those Census Blocks.

Respectfully submitted,
ALL WEST COMMUNICATIONS

By: 
Gerard J. Duffy

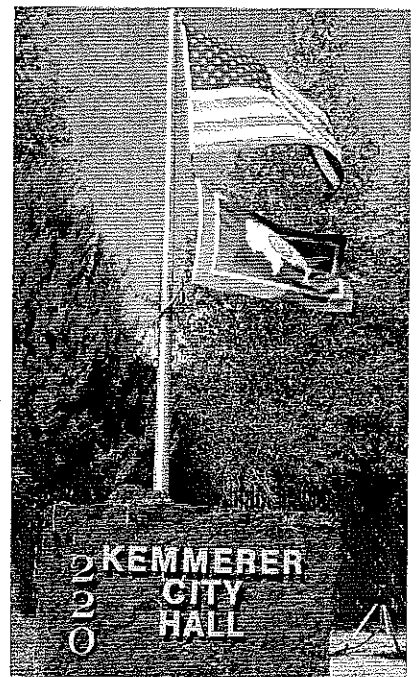
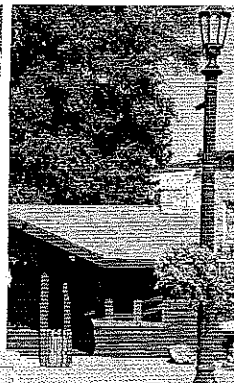
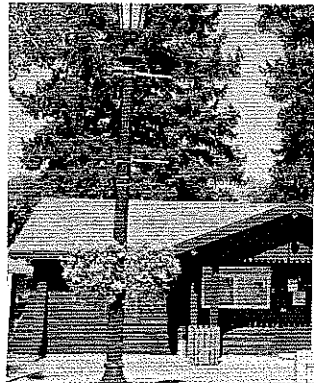
Its Attorney

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Dated: November 7, 2016

ATTACHMENT A

Wyoming Census Blocks	Census Block #	Area	# of Customers	# of Homes Passed	# of Businesses Passed
	560239784003088	Kemmerer	1	0	4
	560239784003091	Kemmerer	0	0	0
	560239784003028	Kemmerer	3	38	16
	560239784003092	Kemmerer	0	42	0
	560239784001222	Kemmerer	0	10	0
	560239784001215	Kemmerer	0	11	0
	560239784001129	Kemmerer	0	5	0
	560239784001226	Kemmerer	0	0	1
	560239784001204	Kemmerer	0	2	0
	560239784001196	Kemmerer	0	2	0
	560239784001200	Kemmerer	0	2	0
	560239784001203	Kemmerer	0	2	0
	560239784001040	Kemmerer	0	0	1
	560239784001042	Kemmerer	1	0	1
	560239784001118	Kemmerer	1	0	1
	560239784001117	Kemmerer	0	0	1
	560239784002017	Kemmerer	1	6	0
	560239784003032	Kemmerer	0	0	0
	560239784003082	Kemmerer	1	3	6

ATTACHMENT B



Lincoln County, Wyoming

Fiber was needed to fill broadband gaps, and All West stepped up to the plate

Above: All West's fiber build will serve the needs of existing businesses in Lincoln County and be a valuable incentive for future economic development.

Page 5: The South Lincoln Training & Event Center seats up to 469 people and is available for business, cultural and social events.

While Lincoln County's nearly 4,100 square miles feature an abundance of ruggedly beautiful landscapes, the area was coming up short in its underground communications infrastructure. Specifically, significant broadband gaps were identified several years ago in Lincoln County.

Jonathan Teichert, Lincoln County Planning & Engineering, explains, "When the State of Wyoming did its WyoLink Project, it highlighted our broadband gaps, especially in the Kemmerer area with its one provider and aging copper cable infrastructure. It was clear we were behind when it came to broadband and needed to make infrastructure improvements."

Seeking Funds for Fiber

Teichert continues, "Lincoln County applied to the Wyoming Business Council to install the infrastructure from Sage Junction to the communities of Kemmerer and Diamondville with a fiber ring." The Business Council administers the Business Ready Community Grant and Loan Program (BRC), which provides financing for publicly owned infrastructure that serves the needs of businesses and promotes economic development within Wyoming communities.

In preparation for the BRC grant application, Lincoln County approached several communications providers to discuss the building process and requirements for a fiber network in the area. "Only All West expressed interest in the project. When we were writing the grant proposal, All West gave us cost estimates for fiber, explained the terminology and wrote a letter of commitment. They stepped up to the plate to fill the broadband gaps," notes Teichert.

The Business Council awarded \$1.4 million dollars to Lincoln County, and this grant was paired with a 15 percent match from All West in the form of in-kind services. These services included permitting, cultural clearances, and engineering design and construction.

Many Benefits for Lincoln County

"The fiber network is now pretty close to being finished. Since the costs came in under the bid, we

were able to add some work to the project such as final-mile fiber connectivity to major businesses and organizations in the Kemmerer area. Lincoln County stands to benefit from this fiber network in many ways. It will facilitate improved services and technology for our health-care providers, school district, mine and power plant. It will also encourage growth for existing and new businesses, leading to more jobs, a more diverse economy and increased tax revenues," Teichert says.

He adds, "Because of fiber, Kemmerer will be able to market itself as a Gig community. I'm happy to see this fiber project come to fruition. It's a big deal, similar to the impact of electrification in our country 100 years ago. Fiber is critical to rural communities."

A Growing Role for All West

The Lincoln County Courthouse in Kemmerer and the branch office in Afton are still under contract with other

communications providers for internet and voice services but will switch to All West when those contracts expire. It's a change that Teichert looks forward to making.

He explains, "Once All West becomes our provider, Lincoln County will finally have access to the reliable broadband needed to meet our growing needs. I think the biggest advantage will be the much higher internet speeds delivered by fiber. For example, since our offices often use videoconferencing, faster speeds will be a big benefit in terms of video quality."

While working on the fiber project, Teichert's primary contact at All West has been Jack Walkenhorst. He says, "All West has been great to work with and is responsive to our questions and needs. Lincoln County is very appreciative of the ongoing support we've received from All West."



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— JONATHAN TEICHERT, LINCOLN COUNTY PLANNING & ENGINEERING

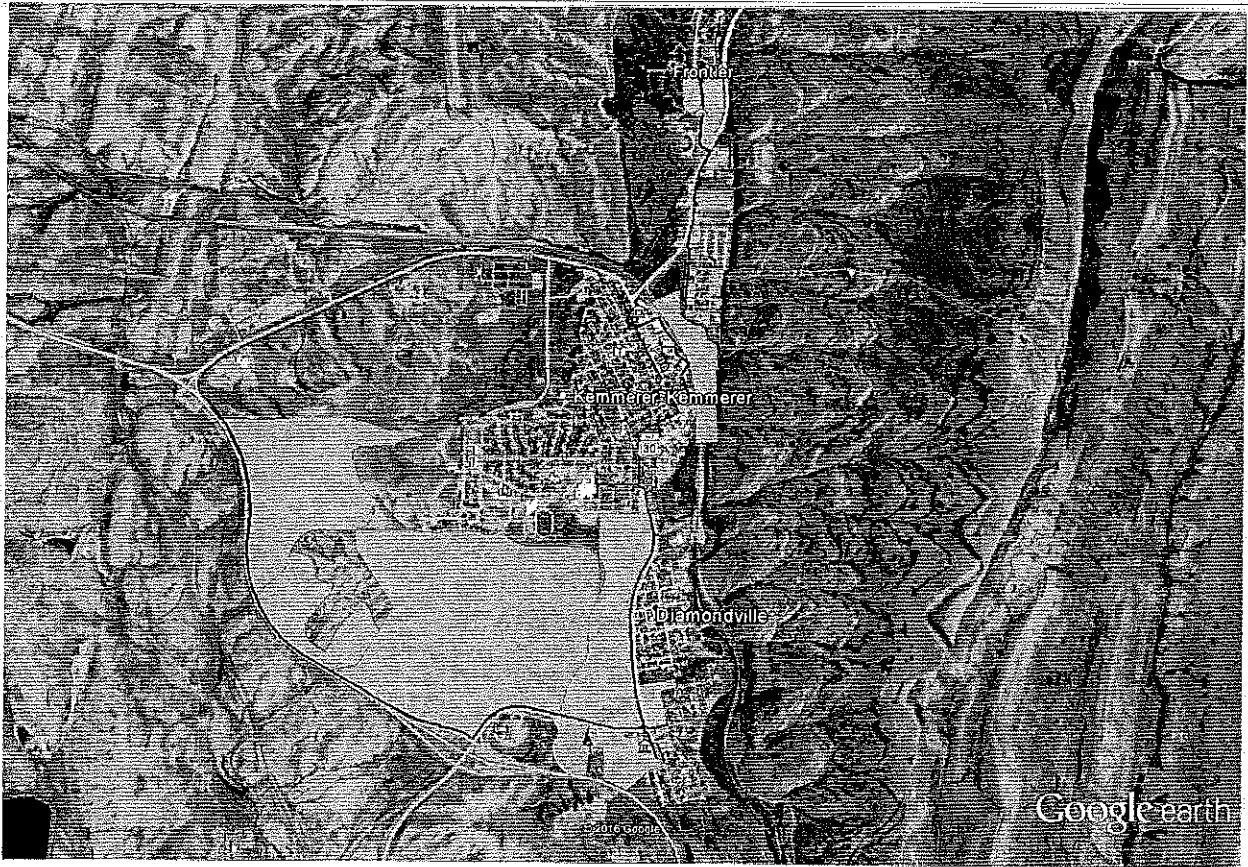
WHAT WILL THE FUTURE LOOK LIKE WITH FIBER?

Fiber is the only technology that delivers enough bandwidth, reliably and at a low enough cost, to meet growing demands. Take a peek at what fiber is making possible:

- **Telehealth services** can give instant access to medical specialists via videoconferencing from the home, fitness center or community room. This videoconferencing may be integrated with internet-enabled diagnostic devices (such as blood pressure cuffs and respiration measurement), electronic medical records systems, online prescription services and online appointment setting.
- **Community-based security systems** can be stationed on light poles and buildings around neighborhoods. Consisting of linked IP video cameras and sensors, these systems could identify and track intruders as well as automatically notify owners, security companies and the police.
- **Concierge and home-automation services** can make residents' lives more comfortable and convenient. For example, cameras will be able to recognize residents' cars entering the community and alert parking attendants and security personnel, and then turn on lights and heating or air conditioning inside homes.

All West began providing fiber optic services in our service area more than 20 years ago, getting ahead of the curve with this technology.

ATTACHMENT C




Google earth



DECLARATION

I, Matt Weller, hereby declare under penalty of perjury that:

1. I am the President of All West Communications ("All West).
2. I have reviewed the "Notification of Service to Census Blocks that CenturyLink Proposes to Serve" that has been prepared for filing with the Federal Communications Commission and CenturyLink on November 7, 2016, and state that the factual statements therein regarding All West's facilities, services and service plans are true and correct.


Matt Weller

11/7/16
Date